



**OBJECTION**

**COMES NOW**, Michael G. Malaier, the Chapter 13 Trustee, and hereby objects to Debtor's claimed exemptions as amended pursuant to 11 U.S.C. §522(l) and Fed. R. Bankr. P. 4003(b). The Trustee makes this objection without limitation to those exemptions set forth on Schedule C of the bankruptcy schedules filed in this case. Trustee objects to specific exemptions as follows:

Description of Property	Statute(s) Cited	Exemption Claimed	Petition Value	Trustee's Estimated Value
Potential personal injury claim for motor vehicle accident on 5/11/18	Wash. Rev. Code § 6.15.010(1)(d)(vi)	\$20,000.00	\$5,000.00	Unknown

The applicability of Debtor's exemptions cannot be determined until the claim is liquidated. Trustee, therefore, objects to the exemptions claimed by Debtor to preserve any and all rights that Trustee may have to raise such objections on receipt of additional information regarding the nature of the assets and the basis for the claim of exemption. Trustee also reserves the right to assert any other basis for an objection regarding any exemption or to otherwise amend his objections to any exemption as may be appropriate at a the time the claim is liquidated. Therefore, the claimed exemption should be held in abeyance until such time as the claim is liquidated.

**WHEREFORE** the Trustee files this objection to preserve these issues, pending the Trustee's investigation and evaluation, and in the event the Debtor becomes entitled in the future to a settlement or other payment on the claim.

**DATED** this 3rd day of May, 2019.

/s/ Mathew S. LaCroix  
Mathew S. LaCroix, WSBA #41847 for  
Michael G. Malaier, Chapter 13 Trustee

## CERTIFICATE OF MAILING

I certify under penalty of perjury under the laws of the United States that on May 3, 2019, I caused to be mailed via regular mail a true and correct copy of Trustee's Objection to Exemptions and proposed Order to the following:

Celena Ann Williams  
7129 NE 28<sup>th</sup> Ave  
Vancouver WA 98665

The following parties received Trustee's Objection to Exemptions and proposed Order via ECF:

Ellen Ann Brown  
Lance E. Olsen  
U.S. Trustee

Executed at Tacoma, Washington this 3rd day of May, 2019.

/s/ Ruth Wilson  
Motion Coordinator for  
Chapter 13 Trustee

## TRUSTEE'S OBJECTION TO EXEMPTIONS AND NOTICE OF HEARING

Michael G. Malaier  
Chapter 13 Standing Trustee  
2122 Commerce Street  
Tacoma, WA 98402  
(253) 572-6600